

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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JOHN J. VAUGHN, GERALD A. KALBFLEISCH, MICHAEL
HATHAWAY and MYRTLE HATHAWAY, :
:
Plaintiffs, : Civil Action
: No. 04-10988-GAO
v. :
:
PUTNAM INVESTMENT MANAGEMENT, LLC and : **ORAL ARGUMENT**
PUTNAM RETAIL MANAGEMENT LIMITED PARTNERSHIP, **REQUESTED**
:
Defendants. :
:
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JOHN J. VAUGHN, GERALD A. KALBFLEISCH, MICHAEL
HATHAWAY, and MYRTLE HATHAWAY, :
:
Plaintiffs, : Civil Action
: No. 06-11438-GAO
v. :
:
PUTNAM INVESTMENT MANAGEMENT, LLC and
PUTNAM RETAIL MANAGEMENT LIMITED PARTNERSHIP, :
:
Defendants. :

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DEFENDANTS' MOTION TO STAY CIV. NO. 06-11438-GAO ("VAUGHN II")
PENDING THIS COURT'S RESOLUTION OF CIV. NO. 04-10988-GAO ("VAUGHN I")

Pursuant to Rule 1 of the Federal Rules of Civil Procedure and this Court's inherent authority, Putnam Investment Management, LLC and Putnam Retail Management Limited Partnership, defendants in the above captioned actions, respectfully move this Court to enter an order staying all proceedings in Civil No. 06-11438-GAO (Vaughn II) until this Court's resolution of Civil No. 04-10988-GAO (Vaughn I). The grounds for Defendants' motion are set out in an accompanying memorandum of law.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), Defendants request oral argument on this motion.

LOCAL RULE 7.1(A)(2) CERTIFICATION

The undersigned counsel hereby certifies that counsel for Defendants has conferred with counsel for Plaintiffs, and have not been able to narrow the issues presented herein.

Dated: September 26, 2006
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll
James R. Carroll (BBO #554426)
David S. Clancy (BBO #636031)
Scott T. Lashway (BBO #655268)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Beacon Street
Boston, Massachusetts 02108
(617) 573-4800
jcarroll@skadden.com
dclancy@skadden.com
slashway@skadden.com

Counsel for Defendants Putnam Investment
Management, LLC and Putnam Retail
Management Limited Partnership

CERTIFICATE OF SERVICE

I, Scott T. Lashway, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 26, 2006.

September 26, 2006

/s/ Scott T. Lashway